

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**IN RE REEBOK EASYTONE LITIGATION**

This Document Relates to: All Actions

**Case No. 4:10-CV-11977-FDS**

**CLASS ACTION**

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT  
OF EXPENSES AND INCENTIVE AWARD**

Plaintiffs Sandra Altieri, Cheryl Hardy, and Courtney Schwartz (collectively, “Plaintiffs”), by and through their undersigned counsel of record, respectfully move this Court, pursuant to Fed. R. Civ. P. 23(h), for an award of attorneys’ fees and reimbursement of expenses to Plaintiffs’ counsel, and for payment of incentive awards to the Plaintiffs. Plaintiffs move for attorneys’ fees in the total amount of \$3.5 million and an expense reimbursement in the sum of \$82,300. Plaintiffs also move for an incentive award of \$2,500 to each of the three named plaintiffs.

As more specifically set forth in the accompanying Plaintiffs' Memorandum of Law in Support of Motion for Award of Attorneys Fees, Reimbursement of Expenses and Incentive Award and in the accompanying Declaration of Timothy Blood in Support of Plaintiffs' Joint Motion for Final Approval of Class Action Settlement and Certification of Settlement Class and Motion for Award of Attorneys' Fees, Reimbursement of Expenses and Incentive Award, Plaintiffs' request for an award of attorneys fees and reimbursement of expenses and payment of incentive awards meet all of the applicable standards for such awards considered by the First Circuit Court of Appeals and this Court.

WHEREFORE, Plaintiffs respectfully request that the Court grant their request for attorneys' fees, reimbursement of expenses and incentive awards as set forth herein.

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

Plaintiffs' counsel have conferred with counsel for Defendant in a good faith effort to resolve or narrow the issues raised by this Motion with the following result: Defendant does not oppose the relief sought by this Motion.

DATED: December 14, 2011

GILMAN AND PASTOR, LLP

/s/ David Pastor

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, and that copies have been served on the following individuals listed on the docket as objectors on December 14, 2011:

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